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IRIS Y. MARTINEZ

CIRCUIT CLERK

COOK COUNTY, IL.

2021L007543

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

CHASTITY PENDLETON,	)	
	)	
Plaintiff,	)	
	)	No.
vs.	)	
	)	
WALMART INC., a Delaware corporation,	)	
	)	
Defendant.	)	

**COMPLAINT AT LAW**

NOW COMES Plaintiff, Chastity Pendleton, by and through her attorney, Leonard S. Becker, Attorney at Law, complaining of Defendant, Walmart Inc., a Delaware corporation, and states as follows:

1. That at the time of said occurrence hereinafter complained of and prior, Defendant, Walmart Inc. (herein after "Walmart"), was and is a Delaware corporation doing business in Cook County, Illinois.
2. That on and prior to July 29, 2019, Defendant owned, rented, leased, maintained, possessed, managed, controlled and/or inspected property located at or near 2300 Sycamore Road, City of DeKalb, County of DeKalb, State of Illinois at which it operated one of its Walmart stores.
3. That on July 29, 2019 at the place aforesaid, Plaintiff, a current resident of Cook County, was a customer of Walmart and was lawfully upon said premises while shopping.
4. At all times relevant, Plaintiff was in the exercise of due care and caution for her own safety.
5. That it then and there became, and was, the duty of Defendant, by and through its employees and agents, to exercise reasonable care and caution in the ownership, possession, control, maintenance, repair and upkeep of the floor of the aisles within its store, so as to avoid causing injury to Plaintiff and other customers walking on the floor of said aisles.

**EXHIBIT B**



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6. As a direct and proximate result of the negligence of Defendant as hereinafter specified, Plaintiff was caused to slip, stumble and trip due to the dangerous condition of said floor, to wit; said floor was unreasonably wet and slippery.
7. That by disregarding its duty in the premises, Defendant was then and there guilty of one or more of the following negligent acts or omissions, to wit:
  - a. Carelessly and negligently failed to maintain said floor at said place in a reasonably safe condition for use by customers;
  - b. Carelessly and negligently mopped or cleaned said floor, leaving the floor wet and slippery;
  - c. Carelessly and negligently failed to warn the Plaintiff and other customers of the dangerous conditions existing thereon, although it knew, or in exercise of ordinary care should have known or had notice of said condition and the danger thereon;
  - d. Carelessly and negligently failed to provide adequate lighting in said structure to allow for customers such as Plaintiff to observe and recognize the danger associated with the wet and slippery floor; and
  - e. Otherwise carelessly and negligently maintained and controlled said floor so as to cause injury to the Plaintiff.
8. That as a direct and proximate result of one or more of the above set forth wrongful acts or omissions on the part of Defendant, Plaintiff was injured and suffered permanent bodily injuries, internal and external, internal derangements, severe bruises and contusions, incurred severe pain and suffering, suffered a severe shock to her nervous system, incurred medical expenses and loss of income, and was otherwise permanently injured.

WHEREFORE, Plaintiff, Chastity Pendleton, prays for judgment against Defendant, Walmart, Inc., a Delaware corporation, in a sum in excess of FIFTY THOUSAND DOLLARS (\$50,000.00) plus costs.

/s/ Leonard S. Becker



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**RULE 222 AFFIDAVIT**

In accordance with Rule 222, Leonard S. Becker, counsel for Plaintiff, Chastity Pendleton, certifies pursuant to Section 1-109 of the Illinois Code of Civil Procedure that the total of money damages sought in this suit exceeds \$50,000.00.

/s/ Leonard S. Becker

Leonard S. Becker  
Attorney for Plaintiff  
311 N. Aberdeen, Ste. 200D  
Chicago, IL 60607  
(312) 492-7700  
lenbecker@lsblaw.net  
Atty. No. 30278